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By ECF and Email

The Honorable Mary Kay Vyskocil
United States District Court
Southern District of New York
500 Pearl Street, Room 2230
New York, NY 10007

USDC SDNY
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Re: Pecou v. Bessemer Trust Company et al., Case No. 22-cv-1019-MKV (S.D.N.Y.)

Dear Judge Vyskocil:

We represent Defendants Bessemer Trust Company (“Bessemer”) and the Profit-Sharing Plan Committee of Bessemer Trust Company (collectively, “Defendants”) in the above-referenced action.

Pursuant to Section 9 of Your Honor’s Individual Rules of Practice in Civil Cases, Defendants respectfully request that the Court accept a redacted version of Exhibit A to the Declaration of Joseph E. Clark that was filed earlier today in support of Defendants’ Opposition to Plaintiff’s Motion for Leave to Amend the Complaint. We have also filed contemporaneously herewith, under seal, Mr. Clark’s Declaration and Exhibit A thereto, highlighting the proposed redactions. Defendants request to redact the name and home address of a former employee of a Bessemer affiliate—who is not a party to this action—for privacy reasons. The proposed redactions are limited to what is necessary to protect the individual’s interests in keeping this information confidential. *See, e.g., City of Almaty, Kazakhstan v. Ablyazov*, No. 15-cv-5345, 2021 WL 1177737, at *3 (S.D.N.Y. Mar. 29, 2021) (permitting redaction of individual’s home address in light of “[c]ompelling privacy interests”).

We thank the Court for its consideration of this request.

Respectfully submitted,

/s/ Russell L. Hirschhorn

Russell L. Hirschhorn

cc: All counsel of record

Granted. SO ORDERED.

Date: 8/9/2022
New York, New York

Mary Kay Vyskocil
United States District Judge